

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

TATUNG COMPANY; et al.,

Defendants.

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Civil Action No. 04-343-JJF

**DECLARATION OF RICHARD D. KIRK**

I, Richard D. Kirk, declare under penalty of perjury as follows:

1. I am an attorney with The Bayard Firm, a Delaware law firm located at 222 Delaware Avenue, Suite 900, P.O. Box 25130, Wilmington, DE 19899. The Bayard Firm is local counsel for Plaintiff LG.Philips LCD Co., Ltd. ("LPL") in this case;
2. I am submitting this declaration in conjunction with LPL's Response to Interim Objections of Defendants Tatung Company and Tatung Company of America to Report and Recommendation of Special Master;
3. Attached hereto as Exhibit A is LPL's Motion to Compel Interrogatory Answers filed with the Special Master on March 18, 2005 (without exhibits);
4. Attached hereto as Exhibit B is LPL's Motion to Compel Document Production filed with the Special Master on March 18, 2005 (without exhibits);
5. Attached hereto as Exhibit C is LPL's Motion to Compel Tatung Depositions filed with the Special Master on March 18, 2005 (without exhibits);
6. Attached hereto as Exhibit D is LPL's Motion to Establish New Schedule for Jurisdictional Discovery filed with the Special Master on March 18, 2005 (without exhibits);

7. Attached hereto as Exhibit E is LPL's Local Rule 7.1.1 Certification Concerning Motions Submitted to Special Master on March 18, 2005 (without exhibits);

8. Attached hereto as Exhibit F is LPL's Motion for Sanctions Against Tatung Defendants filed with the Special Master on May 6, 2005 (without exhibits);

9. Attached hereto as Exhibit G is the transcript of the hearing held on March 30, 2005 before the Special Master;

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of September, 2005.


  
Richard D. Kirk

EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL

EXHIBIT C

FILED UNDER SEAL

EXHIBIT D

FILED UNDER SEAL

EXHIBIT E

FILED UNDER SEAL

EXHIBIT F

FILED UNDER SEAL



EXHIBIT G

FILED UNDER SEAL

### CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on September 20, 2005, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

Richard L. Horwitz, Esq.  
David E. Moore, Esq.  
Potter Anderson & Corroon LLP  
1313 N. Market St., 6<sup>th</sup> Fl.  
Wilmington, DE 19801

Jeffrey S. Goddess, Esq.  
Jessica Zeldin, Esquire  
Rosenthal, Monhait, Gross & Goddess  
Mellon Bank Center, Suite 1401  
Wilmington, DE 19801

The undersigned counsel further certifies that copies of the foregoing document were sent by hand to the above counsel and by email and first class mail to the following non-registered participants:

Julian M. Baum, Esq.  
Robert C. Weems, Esq.  
Baum & Weems  
58 Katrina Lane  
San Anselmo, CA 94960

Scott Miller, Esq.  
Tracy Roman, Esq.  
Bingham McCutchen LLP  
355 South Grand Ave., 44th Floor  
Los Angeles, CA 90071-3106

/s/ Richard D. Kirk (rk0922)  
Richard D. Kirk